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State of Washington

DEPARTMENT OF FISH AND WILDLIFE

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April 18, 2019

Margaret Everson, J.D.
Principal Deputy Director Exercising the Authority of the Director
U.S. Fish and Wildlife Service
Administration Office, National Programs Headquarters
Main Interior
1849 C Street NW, Room 3331
Washington, D.C. 20240-0001

Dear Ms. Everson:

Thank you for the invitation to comment on the March 15, 2019, proposal to remove the gray wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife. The Washington Department of Fish and Wildlife (Department) appreciates the long-standing partnership and close interagency coordination with the U.S. Fish and Wildlife Service (USFWS) regarding gray wolf management in Washington since the first wolf pack was documented in our state in 2008.

The Department is committed to the recovery of gray wolves in Washington, and we are pleased that federal Endangered Species Act (ESA) and Washington State Endangered Species protections are working and allowing for recolonization of Washington by wolves. Since the first Department survey in 2008, the state's wolf population has grown by an average of 28 percent per year. As of December 31, 2018, wolf numbers in Washington have increased to a minimum of 126 individuals, 27 packs, and 15 successful breeding pairs, marking a population increase for the 10th consecutive year and the highest counts to date (full details are available in the Washington Gray Wolf Conservation and Management 2018 Annual Report accessible via <https://wdfw.wa.gov/publications/02062>). Not only is Washington's wolf population growing, but its distribution is also expanding westward in the state. In 2018, Department biologists confirmed the state's first wolf pack west of the Cascade crest in the modern era, and the number of packs in the North Cascades recovery region increased from three to five and the number of successful breeding pairs from one to three. The Department is confident that Washington's wolf population is on a path leading to successful recovery.

To ensure ongoing success of wolf recovery in Washington, it is fitting for the wolf's federal listing status to keep pace with the on-the-ground recovery status of the species in the state. The Department finds the USFWS proposal to remove gray wolves from the federal List of Endangered and Threatened Wildlife and return management authority in the western two-thirds

of Washington to the Department appropriate and timely. This is the right direction for wolf conservation and management in our state long-term for several reasons.

Any action that undermines the purpose and integrity of the ESA leaves this critically important law vulnerable to scrutiny and legislation that could set dangerous precedents of weakening the ESA. The law is intended to provide plans and resources for species in danger of extinction; for a species to remain forever listed as endangered under the ESA would indicate failure to recover them (and is a misuse of the law if they are recovered). Delisting of the gray wolf is a conservation success story. As elucidated above, reestablishment and recovery of wolves in Washington is well underway with the population showing a consistent growth trend during the past decade. The state of Washington is well-prepared to be the management authority for wolves statewide and would be pleased to see limited federal resources directed to other species still critically in need. Wolves are currently listed as state endangered throughout Washington, and any future change in state listing status will be predicated on biological status based on the preponderance of scientific data available. Wolf recovery and subsequent population sustainability long-term will remain a Department priority.

Recovery of wolves was the primary goal of the Wolf Conservation and Management Plan in 2011 (available at <https://wdfw.wa.gov/publications/00001>) and it has been a key mission of the Department ever since. Washington has strived to be a leader in wolf conservation and management. Unique among states in its approach, Washington took proactive steps once wolves began recolonizing the state, resulting in the following:

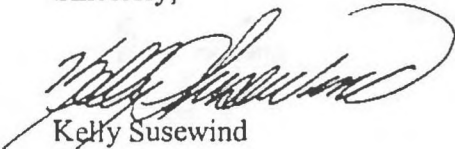
- A state recovery plan developed over nearly five years (2007-2011) with the assistance of a 17-member citizen advisory wolf working group representing a diversity of stakeholder perspectives; the process included extensive public review (23 public meetings and nearly 65,000 comments submitted) and a blind scientific peer review;
- Dedicated sources of state funding to implement and manage wolf recovery, as well as a history of budget enhancements for wolf recovery efforts from the state Legislature;
- Third-party-neutral facilitation to bring together a spectrum of stakeholders and values to build cohesion around often diametrically opposed environmental and agricultural perspectives to foster a foundation of trust, social tolerance, and opportunities for positive outcomes;
- Stakeholder cohesion in the current protocol for wolf-livestock interactions (available at https://wdfw.wa.gov/sites/default/files/2019-02/final_protocol_for_wolf-livestock_interactions_jun012017.pdf) that reflects a wide range of values and extensive participation from livestock producers, environmental groups, and hunting advocates, reflecting the Department's commitment to do the maximum possible to understand and respond to public values and community concerns regarding wolf recovery;

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- Guidelines for the consideration and implementation of the wolf-livestock interaction protocol, including proactive non-lethal deterrence measures, depredation investigations and responsive deterrence measures, and criteria for lethal removal of wolves;
- The Department has initiated a post-delisting conservation and management planning effort to ensure wolves continue to be managed in a way that keeps them present on the landscape.

Considering the provisions outlined above, the Department is well-prepared for this proposal to be enacted. The existing 2011 Wolf Conservation and Management Plan covers the breadth of Washington. Not only are wolves thriving within our state borders and demonstrating the capacity for growth and westward distribution, but the population is also connected to and part of the robust, recovered wolf populations in Idaho, Montana, Wyoming, Oregon, and Canada. Should this federal wolf delisting proposal move forward, we will continue to work closely with our partners, stakeholders, and communities, just as we have over the past decade, on the recovery, recolonization, conservation, and management of wolves in Washington.

Sincerely,



Kelly Susewind
Director

cc: Brad Thompson, USFWS

